

February 2, 2017

SUBMITTED ELECTRONICALLY VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Notice of *Ex Parte* Presentation**

WT Docket No. 99-87, Implementation of Sections 309(j) and 337 of the
Communications Act of 1934, as Amended

Dear Ms. Dortch:

On January 31, 2017, Douglas M. Aiken, Executive Director of the International Municipal Signal Association (“IMSA”), and the undersigned counsel conducted a single meeting with the following members of the Commission’s staff regarding IMSA’s request for waiver of Sections 90.203(j)(4)-(5) of the Commission’s rules:

Ira Keltz (Office of Engineering and Technology)
David Furth (Public Safety and Homeland Security Bureau)
Michael Wilhelm (Public Safety and Homeland Security Bureau)
Roberto Mussenden (Public Safety and Homeland Security Bureau)
Melvin Spann (Public Safety and Homeland Security Bureau)
Scot Stone (Wireless Telecommunications Bureau)

We urged the Commission to act promptly on IMSA’s request, observing the widespread support within the public safety community, as evidenced by the *ex parte* letter submitted by the National Public Safety Telecommunications Council (“NPSTC”). We pointed out that granting the relief sought would not retard the Commission’s efforts to promote adoption of narrowband technologies; larger public safety entities are already implementing systems with 6.25 kHz capabilities. In contrast, the waiver that IMSA seeks would provide meaningful relief principally to smaller public safety entities for on-scene communications, consistent with Chairman Pai’s efforts to protect small entities from unnecessary regulatory obligations.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and a copy of this letter has been sent to Commission staff with whom we met. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Russell H. Fox

Russell H. Fox

cc: (each by e-mail)
Ira Keltz
David Furth
Michael Wilhelm
Roberto Mussenden
Melvin Spann
Scot Stone